REMARKS

This is intended as a full and complete response to the Office Action dated July 31, 2003, having a shortened statutory period for response set to expire on October 31, 2003. Please reconsider the claims pending in the application for reasons discussed below.

In the specification, the paragraphs [0070], [0079], and [0111] have been amended to correct minor editorial problems.

Claims 1 – 20 remain pending in the application and are shown above. Claims 1 - 20 are rejected. Reconsideration of the rejected claims is requested for reasons presented below.

Claims 17 - 20 are amended to correct improper dependency. Claims 1 and 16 are amended to identify the proper subject matter. These amendments are not presented to distinguish a reference, thus, the claims as amended are entitled to a full range of equivalents.

Claims 1 - 20 stand rejected under 35 USC § 102(e) as being anticipated by *Ankireddipally et al.* (US 2002/0116205, hereinafter *Ankireddipally*). Applicants respectfully traverse the rejection. Withdrawal of the rejection is respectfully requested.

Ankireddipally is directed to a distributed transaction processing system that manages transaction processing and message flow among application programs in a distributed computer network such as the internet. (*See*, Abstract.) The Examiner suggests that the claimed element of a data structure configured as an interface definition of a message format comprising protocol information identifying a protocol and the particular transaction type is taught by *Ankireddipally* on page 6, paragraph 0047, lines 5-15. The Applicants respectfully point out that the cited paragraph is directed to a transport protocol. A transport protocol is a communications protocol by means of which messages are transported. The protocol and protocol information recited in the present application are, however, directed to transaction protocols, not transportation protocols. The transaction protocols dictate message format while a transportation protocol dictates the semantics of the transportation mechanism by which information is transmitted. To highlight the difference, consider that information transmitted by a particular transport protocol (e.g., TCP/IP) may include messages defined according to

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a particular transaction protocol (e.g., cXML). Accordingly, the transport protocols of *Ankireddipally* do not in any way teach, show, or suggest transaction protocols.

Furthermore, the Examiner suggests that the element of request message format information identifying a request message format for the particular eCommerce transaction type, wherein the request message format comprises a plurality of input fields is taught by *Ankireddipally* on page 5, paragraph 0043, lines 3-11. The Applicants respectfully point out that the cited paragraph (paragraph 0043) is directed to an XML message and the capability to identify different message types. The claimed element of request data format information identifying a request message format is not the message itself, nor is the data structure containing the request data format information the message itself. Rather, the request data format information provides an abstraction of a message according to the schema of that message. Accordingly, *Ankireddipally* does not teach, show, or suggest a data structure containing all of the claimed elements of the present invention. Withdrawal of the rejection is respectfully requested.

Most significantly, the Applicants note that what is claimed is a data structure containing various elements of information. Accordingly, a rejection for anticipation can only be made by identifying in the prior art a data structure as claimed. The Applicants respectfully submit that the Examiner has not identified a single data structure that contains all the claimed elements. More specifically, the Examiner bases one part of his rejection on a transport protocol described at paragraph 0047 and another part of his rejection on an unrelated description of an XML document (which may be transported according to the transport mechanism) at paragraph 0043. The XML document is not the transport protocol and the transport protocol is not the XML document. Therefore, no single data structure, as recited by the present claims, has been identified by the Examiner.
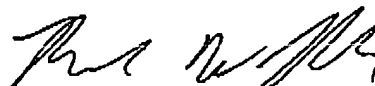
In conclusion, the reference cited by the Examiner does not teach, show, or suggest the invention as claimed.

The secondary references made of record are noted. However, it is believed that the secondary references are no more pertinent to the Applicant's disclosure than the primary references cited in the office action. Therefore, Applicant believes that a

detailed discussion of the secondary references is not necessary for a full and complete response to this office action.

Having addressed all issues set out in the office action, Applicant respectfully submits that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,

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